

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

INSIGHT INVESTMENTS, LLC,)	
a Delaware limited liability company,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-20-788-G
)	
(1) NORTH AMERICAN SPECIALTY)	
INSURANCE COMPANY, a New)	
Hampshire corporation,)	
)	
Defendant.)	

**JOINT MOTION TO EXTEND THE JOINT STATUS REPORT AND
DISCOVERY PLAN DEADLINE AND CONTINUE THE
STATUS AND SCHEDULING CONFERENCE**

Pursuant to Fed. R. Civ. P. 6(b) and LCvR7.1(h), plaintiff, Insight Investments, LLC (“Insight”) and defendant, North American Specialty Insurance Company (“NAS”), jointly submit their motion to extend the joint status report and discovery plan deadline and continue the January 6, 2021 status and scheduling conference:

1. On December 3, 2020, this Court issued its Status and Scheduling Conference Docket [Doc. 24] which provided the parties notice of their submission deadline for the joint status report and discovery plan and scheduled the status and scheduling conference. The notice to counsel provision expressly provides, “Lead trial counsel shall participate in the status and scheduling conference. Failure of lead counsel to appear will prevent counsel from participating at trial.”

2. On December 23, 2020, NAS’ lead counsel, Robert L. Magrini, unexpectedly lost an immediate family member and has since been on bereavement leave. Mr. Magrini is expected to remain on bereavement leave until mid-to late- January 2021.

3. The Status and Scheduling Conference Docket [Doc. 24] set forth the parties' current deadlines, without the requested extension, as follows:

- a. The parties to file their Joint Status Report and Discovery Plan by Wednesday, December 30, 2020;
- b. The parties to advise the Court of participants for the scheduling conference by December 31, 2020, at 12:00 p.m.; and,
- c. The Status and Scheduling Conference is set for January 6, 2021, at 10:00 a.m.

4. The parties request a 30-day extension of the Joint Status Report and Discovery Plan deadline and continuance of the Status and Scheduling Conference to allow NAS' lead counsel, Robert L. Magrini, the opportunity to provide input and be present for the scheduling conference.

5. This is a joint motion which both parties believe the requested relief is in the best interest of the matter.

6. The parties have not requested a previous continuance of the deadlines set forth in the Status and Scheduling Conference Docket. The requested continuance, if granted, will have no impact on the scheduled trial or other deadlines.

7. Accordingly, the parties request the Joint Status Report and Discovery Plan deadline be extended and the Status and Scheduling Conference be continued and set for dates in February 2021.

WHEREFORE, plaintiff, Insight Investments, LLC and defendant, North American Specialty Insurance Company, pray this Court extend and continue the Status and Scheduling Conference Docket [Doc. 24] dates and set for dates in February 2021. A proposed order is attached.

Respectfully submitted,

s/P. Scott Hathaway

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